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CLERK, U.S. DISTRICT COURT

5/29/2025

CENTRAL DISTRICT OF CALIFORNIA
BY: ____MMC ___DEPUTY

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3	Chief, Criminal Division	32)							
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10	UNITED STATES OF AMERICA								
11	UNITED STATES	DISTRICT COURT							
12	FOR THE CENTRAL DISTRICT OF CALIFORNIA								
13	UNITED STATES OF AMERICA,	CR 5:25-CR-00182	2-MRA 1						
14	Plaintiff,	GOVERNMENT'S NOTEDETENTION	ICE OF REQUEST FOR						
15	V.	DETENTION							
16	THOMAS EUGENE STREAVEL,								
17	Defendant.								
18		l							
19	Plaintiff, United States of A	America, by and thr	rough its counsel						
20	of record, hereby requests detenti	ion of defendant an	d gives notice of						
21	the following material factors:								
22	☐ 1. Temporary 10-day Detenti	on Requested (§ 31	42(d)) on the						
23	following grounds:								
24	a. present offense comm.	itted while defenda	ant was on release						
25	pending (felony tria	1),							
26	☐ b. defendant is an alie	n not lawfully admi	itted for						
27	permanent residence;	and							
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2		С.	defendant may flee; or
3		d.	pose a danger to another or the community.
4	2.	Pre	trial Detention Requested (§ 3142(e)) because no
5		con	dition or combination of conditions will reasonably
6		ass	ure:
7		a.	the appearance of the defendant as required;
8		b.	safety of any other person and the community.
9	3.	Det	ention Requested Pending Supervised Release/Probation
10		Rev	ocation Hearing (Rules 32.1(a)(6), 46(d), and 18 U.S.C.
11		§ 3	143(a)):
12		a.	defendant cannot establish by clear and convincing
13			evidence that he/she will not pose a danger to any
14			other person or to the community;
15		b.	defendant cannot establish by clear and convincing
16			evidence that he/she will not flee.
17	4.	Pre	sumptions Applicable to Pretrial Detention (18 U.S.C.
18		§ 3	142(e)):
19		a.	Title 21 or Maritime Drug Law Enforcement Act ("MDLEA")
20			(46 U.S.C. App. 1901 et seq.) offense with 10-year or
21			greater maximum penalty (presumption of danger to
22			community and flight risk);
23		b.	offense under 18 U.S.C. §§ 924(c), 956(a), 2332b, or
24			2332b(g)(5)(B) with 10-year or greater maximum penalty
25			(presumption of danger to community and flight risk);
26		С.	offense involving a minor victim under 18 U.S.C.
27			§§ 1201, 1591, 2241, 2242, 2244(a)(1), 2245, 2251,
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2251A, 2252(a)(1)-(a)(3), 2252A(a)(1)-2252A(a)(4), 1 2260, 2421, 2422, 2423 or 2425 (presumption of danger 2 3 to community and flight risk); defendant currently charged with an offense described 4 d. in paragraph 5a - 5e below, AND defendant was 5 6 previously convicted of an offense described in 7 paragraph 5a - 5e below (whether Federal or 8 State/local), AND that previous offense was committed 9 while defendant was on release pending trial, AND the 10 current offense was committed within five years of 11 conviction or release from prison on the above-12 described previous conviction (presumption of danger to 13 community). 14 \boxtimes 5. Government Is Entitled to Detention Hearing Under § 3142(f) 15 If the Case Involves: 16 a crime of violence (as defined in 18 U.S.C. 17 § 3156(a)(4)), a violation of 18 U.S.C. § 1591, or Federal crime of terrorism (as defined in 18 U.S.C. 18 19 \$2332b(g)(5)(B)) for which maximum sentence is 10 20 years' imprisonment or more; П 21 b. an offense for which maximum sentence is life 22 imprisonment or death; Title 21 or MDLEA offense for which maximum sentence is 23 24 10 years' imprisonment or more; 25 any felony if defendant has two or more convictions for d. 26 a crime set forth in a-c above or for an offense under 27 state or local law that would qualify under a, b, or c 28

1			if federal jurisdiction were present, or a con	mbination
2			or such offenses;	
3			e. any felony not otherwise a crime of violence	that
4			involves a minor victim or the possession or	use of a
5			firearm or destructive device (as defined in	18 U.S.C.
6			§ 921), or any other dangerous weapon, or inv	olves a
7			failure to register under 18 U.S.C. § 2250;	
8		\boxtimes	serious risk defendant will flee;	
9			serious risk defendant will (obstruct or atte	mpt to
10			obstruct justice) or (threaten, injure, or in	timidate
11			prospective witness or juror, or attempt to d	o so).
12		6.	Sovernment requests continuance of days for	detention
13			nearing under § 3142(f) and based upon the followi	ng
14			reason(s):	
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1	7.	Good cause for continuance in excess of three days exists in
2		that:
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8	Dated: M	Respectfully submitted,
9		BILAL A. ESSAYLI
10		United States Attorney
11		CHRISTINA T. SHAY Assistant United States Attorney
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16		UNITED STATES OF AMERICA
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